

**From:** <Duane\_Marti@ca.blm.gov>  
**To:** "Kristy Chew" <Kchew@energy.state.ca.us>  
**Date:** 9/14/2004 3:56PM  
**Subject:** Re: Transmission corridor planning and development

Kristy,

Unfortunately CEC's schedule for completion of the white paper on CA's electric transmission system update and my priorities does not agree. However, I wanted to provide some comments (in lieu of a formal letter from BLM) on both the Draft Staff White Paper of July 2004 and the testimony given at the August 23 workshop.

(1) Coordination with federal and state agencies

In the exchange between Keith Demetrak (CA DPR) and Commissioner Boyd (at pages 28 to 31 of transcript), the latter is asking if there is a central point of contact (e.g., CA DPR or CA Biodiversity Council) that could serve as a means of dealing with federal and state agencies vice dealing with each of them individually. Armie Perez (CAL-ISO), at pages 71 to 73 of transcript, testified that a task force should be established to develop a policy for designating utility corridors across the state or federally owned lands.

COMMENT - As a representative of Bureau of Land Management (BLM), I can speak for that federal agency and only that federal agency. I would never presume to speak on behalf of another federal agency (e.g., Forest Service, Bureau of Reclamation). So if we are to form a CA task force to study and analyze utility corridors, we need to ensure that the primary surface managing agencies of the federally owned lands (BLM, FS, BOR, and the military services) are involved in that task force from the beginning. I would presume that neither National Park Service or U. S. Fish & Wildlife Service would be receptive to the locating of utility corridors across lands managed by them. Mr. Perez's comment about using the Department of Energy as the federal point of contact (on page 72 of transcript) is an inadvisable idea.

Before he became a Commissioner, Mr. Boyd was a special assistant to the Resource Secretary and as such, chaired the Utility Lands Working Group, which was an ad hoc task force of state and federal agencies, who reviewed and analyzed PG&E's various proposal for the disposition of its "watershed lands". When CPUC was preparing an EIR for one of PG&E's proposals, that task force met often to coordinate the responses of the various state and federal agencies to ensure that a mutual agreed response (and not contradictory) was being given by all of those agencies. As a member of that group, I did not view its process as odious, but rather as an excellent example of interagency cooperation.

Another positive benefit of having both state and federal land managing agencies on the task force would be the opportunity to combine the environmental analysis into one process under NEPA and CEQA.

(2) Utility Corridors planning process

In both the white paper and in public testimony at the workshop

(i.e., Mr. Geier [SD G&E] at pages 56 and 58; Dr. Kondragunta [SCE] at pages 62 & 63; and Mr. Perez at page 72), the concept of utility corridor planning in advance of proposed projects is presented as a desirable option.

COMMENT - BLM strongly supports the concept of utility corridors planning and would be involved wherever and whenever federally owned lands managed by BLM are under study. Both BLM and FS have been involved since the beginning in the Western Regional Corridor Study, which is being updated at this time. Also, BLM, in several ongoing land use planning efforts throughout the state, is analyzing the need and potential locations for utility corridors across BLM managed lands. Review and comment on those proposed corridors by CPUC, CEC, other state agencies, industry groups, and other interested groups would be very helpful to BLM.

If you have any questions, please call me at 978-4675.

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